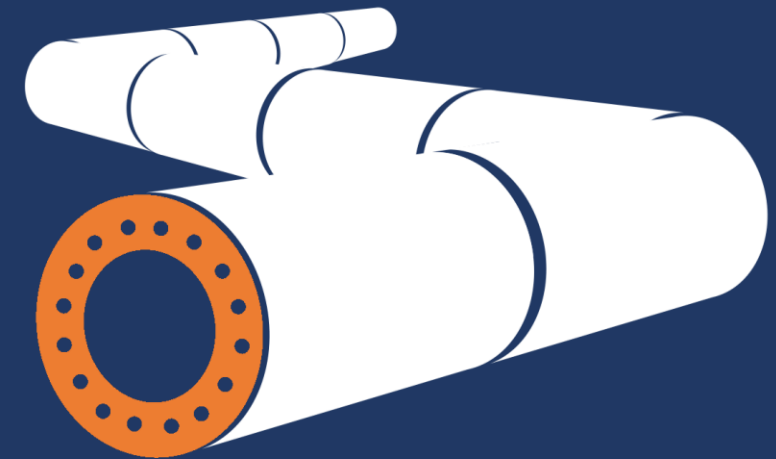


OQ – Moving Beyond the Basics

Operator Qualification Regulatory Requirements AND Expectations

Geoff Isbell, President - ENERGY worldnet, Inc.



OQ – Moving Beyond the Basics

*Operator Qualification Regulatory Requirements **AND** Expectations*

HAVE A QUESTION or COMMENT ?

Just **ask** at any time

or

Send a **text*** message to:

940-399-9653

*(*your text questions will be anonymous)*

OQ – Moving Beyond the Basics

Are you aware of the change that is taking place?

Recognizing the Change Around You



OQ – Moving Beyond the Basics

*Operator Qualification Regulatory Requirements **AND** Expectations*

DOT/PHMSA – Changing Expectations

- Operators should not be struggling with **basics**
- OQ Programs should be **mature**
- Encouraging inspectors to challenge the norm
- Training inspectors to look at OQ differently



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What does this mean in our world?

Master the Basics & Pursue Perfection

“Gentleman, this is a football.”

**“You don’t do things right once in a while, you do them
right ALL them time.”**

– Vince Lombardi

OQ – Moving Beyond the Basics

Why are we here?

Final OQ Rule = The Basics

Intent of the Final OQ Rule

To ensure a **qualified workforce** on jurisdictional pipelines, and thereby, **reduce** the probability and consequence of **pipeline incidents or accidents** caused by **human error**.

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“Each operator shall have and follow a written qualification program.”

7 Elements of the Final OQ Rule +2 Add-Ons

1. Identify Covered Tasks
2. **Evaluate** individuals
3. **Direct & Observe** non-qualified individuals
4. **Re-evaluate** individuals if contributed to an incident
5. **Re-evaluate** individuals if competency is in question
6. Communicate changes
7. **Re-qualification** intervals
8. **Train** individuals, as appropriate
9. Notification of significant program changes

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*What are you **FOCUSED** on?*

Competence or Compliance?

Program Factors to Consider:

- Alignment with Operations (risk vs. expense)
- Process vs. Task (big picture)
- Integration of Training (true competency)
- Measurement (results from the field)



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The Path to Excellence

7 Issues Regulators Want You to Know

1. Self-Inspection
2. Contractor Accountability
3. OQ Plan Consistency
4. Evaluation Content & Methods
5. Abnormal Operations Conditions
6. Span-of Control
7. Suspensions/Disqualifications



OQ – Moving Beyond the Basics

Operator's Should be the Ultimate Inspector

1. QA/QC = Self Inspection

- Operators should be their own inspectors
- There should be no audit surprises for an Operator
- Internal audit processes (leverage PHMSA Forms)
- Field inspections (JSA's?, Projects?, OQ?)
- Program Effectiveness (safety & competency)



OQ – Moving Beyond the Basics

Contractors are Part of the Operator's Workforce

2. Contractor Oversight

- Red flag for hands-off Contractor OQ
- Validate qualifications **and process**
- Look for **gaps** between Operator & Contractor
- Contractor **alignment** to O&M and SOPs



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Contractor OQ Plans...Fact or Fiction?

3. OQ Plans for Contractors ???

- Contractor OQ Plans are **not** an OQ requirement
- OQ Rule is an **Operator issue** (operator workforce)
- If you accept, you must **keep** a copy and **audit**
- Operator and Contractor **alignment** is required
- Audit exception for **inconsistencies** & gaps



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Establishing Workforce Competency and Integrity

4. Evaluation Content and Methods

- Core competency vs. **Operator Specific** (*role of OQIP & B31Q*)
- Address Operator specific **O&M** and **SOPs**?
- Track **failed** test attempts (*review exam history*)
 - Set limit on test **attempts** (*OQIP*)
 - Use **waiting period** between failures (*OQIP*)
- Do performance **simulations** represent reality?



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Recognize and React...or just Recite?

5. Abnormal Operating Conditions

- AOC gaps are still a top inspection issue
- How do you know they can **Recognize & React**?
- Has it been demonstrated and **observed**?
- Ability to discuss does not prove ability to **perform**



OQ – Moving Beyond the Basics

Span-of-Control: The Path to Qualification

6. Span-of-Control / Direct & Observe

- Not a substitute for Qualification
- Who actually performed the work under SOC?
- Length of time working under SOC?
- Is true **Direct and Observe** being utilized?
- Does the SOC overseer always have full **control**?



OQ – Moving Beyond the Basics

Always Verify Qualifications (Competency) before Task Performance

7. Disqualifications/Suspensions

- 2/3 of OQ Rule is checking & re-checking competency
- Suspend and track for suspensions
- Track disqualified workers (including contractors)
- Monitor employees between qualification intervals



OQ – Moving Beyond the Basics

Catching Excellence

#BeBetter

**“Perfection is not attainable, but if we chase perfection
we can catch excellence.”**

– Vince Lombardi

OQ – Moving Beyond the Basics

What are your current thoughts and questions?

Ask, or Text Questions to 940-399-9653

Questions?



OQ – Moving Beyond the Basics

#BeBetter

Thank you.

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